

APPENDIX

In its Motion, NSJP attached an Attorney Affirmation of Abdel-Rahman Hamed, Esq. (“Hamed Aff.”). The Hamed Affirmation contains a chart wherein NSJP lists “each instance . . . in which the citation either does not support or actually contradicts the representation made by Plaintiffs in the FAC, as well as the claims and statements that could be otherwise struck under Rule 12(f).” Hamed Aff. 2. Plaintiffs’ responses to each of the supposedly unsupported allegations are set forth in the table below.

Text and Location	NSJP’s Basis for Striking	Plaintiffs’ Response
Plaintiffs claim Hamas Propaganda includes “objectively false accusations that Israel is an ‘apartheid state’ engaged in a genocide campaign against Palestinians.” FAC ¶ 73.	Scandalous: The source does not say that either accusation is “objectively false”; it says that: “Israel’s establishment as an explicitly Jewish state is a primary point of contention, with many of the state’s critics arguing that this by nature casts non-Jews as second-class citizens with fewer rights. The 1950 Law of Return, for example, grants all Jews, as well as their children, grandchildren, and spouses, the right to move to Israel and automatically gain citizenship. Non-Jews do not have these rights. Palestinians and their descendants have no legal right to return to the lands their families held before being displaced in 1948 or 1967.” FAC n.58.	The allegations in ¶ 73 speak for themselves. The citation NSJP claims renders these allegations “scandalous” was only intended to support the additional allegation in footnote 58 that “[i]t is widely known, for example, that approximately 2 million Muslims live in Israel, and nearly all are citizens or permanent residents.” The cited source manifestly supports this allegation: “Today, about 21 percent of Israel’s population is Arab, totaling some two million people. All are citizens of Israel[,] . . . [and] [t]he majority of Arab citizens are Sunni Muslims.”
Plaintiffs claim the NSJP Toolkit “urges AMP, NSJP, their members, and their allies to provide ‘real’ support to Hamas not only through their arguments and	Scandalous: The Toolkit cited does not call for armed struggle in the United States nor by NSJP members.	The Toolkit states that the concept of liberation “calls upon <i>us</i> ,” meaning NSJP and its members, “to engage in meaningful actions that go beyond symbolism and

<p>rhetoric, but also through ‘confrontation’ that includes, among other things, ‘armed struggle’ and violence.” FAC ¶ 82.</p>		<p>rhetoric. Resistance comes in all forms—<i>armed struggle</i>, general strikes, and popular demonstrations.” ECF No. 24-1 at 5 (emphasis added).</p>
<p>Plaintiffs claim the NSJP Toolkit declares that “[s]ettlers are not ‘civilians’” and therefore can be murdered in cold blood.” FAC ¶ 85.</p>	<p>Scandalous: The Toolkit does not say that Israeli settlers can be murdered in cold blood; it says that “settlers are not ‘civilians’ in the sense of international law, because they are military assets used to ensure continued control over stolen Palestinian land.”</p>	<p>The only plausible reason the Toolkit claims “[s]ettlers are not ‘civilians’” is to justify Hamas’s brutal acts of murder, rape, and torture against Israeli citizens who were unarmed and not in military uniform on October 7. It is reasonable to infer that this statement seeks to justify the murder of civilians in cold blood.</p>
<p>Plaintiffs claim the NSJP Toolkit calls for member organizations to endorse a statement from Bears for Palestine which “encourages Hamas and its affiliates to continue killing and taking hostages.” FAC ¶ 87.</p>	<p>Scandalous: Nowhere in the Bears for Palestine statement do the authors ‘encourage Hamas’ to kill anyone or take hostage; that language does not appear in the statement in any form. The statement includes no references whatsoever to hostages or to killings.</p>	<p>The Toolkit describes Hamas members as NSJP’s “comrades in blood and arms.” The practical effect of this statement is to encourage Hamas and its affiliates to continue their acts of terrorism, which include killing and taking hostages.</p>
<p>Plaintiffs claim “Defendants fund and act as Hamas’s public relations division, recruiting domestic foot soldiers to disseminate Hamas’s propaganda and to incite and engage in violence directed at creating chaos and fear across the United States, intimidating American citizens and policymakers, and forcing American policy to shift in Hamas’s favor. These activities are instrumental to Hamas’s short and long-term goals and help Hamas continue its ongoing international terrorist activities with less</p>	<p>Scandalous: As support for this sweeping claim, Plaintiffs offer a citation to the Terrorism homepage on the FBI’s website. The page does not even mention Hamas, and certainly does not say that NSJP provides these alleged services nor that those services are ‘instrumental’ to Hamas’s goals or ‘help’ Hamas engage in terrorism. FAC n.78.</p>	<p>The allegations in ¶ 93 speak for themselves. The citation in footnote 78 support the allegation that Hamas’s activities are “international terrorist activities.” The FBI defines “international terrorism” as “[v]iolent, criminal acts committed by individuals and/or groups who are inspired by, or associated with, designated foreign terrorist organizations or nations (state-sponsored).” Paragraph 93 credibly alleges that NSJP’s activities are instrumental to Hamas’s acts of international terrorism.</p>

resistance.” FAC ¶ 93.		
Plaintiffs claim SJP members at the University of North Carolina “threateningly brandished knives at Jewish students” and “instigated violence against, among others, a Jewish professor.” FAC ¶ 97(a).	Scandalous: None of the sources cited state that knives were brandished or even mention knives, and the professor mentioned in the complaint is seen on video in one of the sources, waiving an Israeli flag and attempting to barge into a group of student organizers before being led away by the police. FAC n.83.	Plaintiffs are not required to include a citation for every factual allegation made in their Complaint. Further, despite the deference given to Plaintiffs’ well-pleaded allegations at this stage, NSJP attempts to place its own spin on the cited sources. Nevertheless, ample sources support the allegation that UNC SJP members brandished knives at Jewish students, ¹ and the cited sources clearly report that a Jewish professor was violently pushed down the stairs.
Plaintiffs claim the SJP chapter at Cooper Union “hosted an event which included an angry mob that held innocent Jewish students hostage in the library.” FAC ¶ 97(c).	Scandalous: The sources cited directly contradict the claim being made and are therefore misrepresented. The New York Police Department Chief of Patrol John Chell is quoted in the article saying, “there was no direct threats, there was no damage, and there was no danger to any students in that school.” FAC n. 87.	The allegations in paragraph 97(c) are consistent with the cited sources, which detail how Jewish students at the Cooper Union library were forced to hide and seek shelter in various locations throughout the library to avoid detection by the angry mob protesting outside.
Plaintiffs claim SJP members at Brandeis made “explicit threats” against a Hillel Rabbi. FAC ¶ 97(d).	Scandalous: There was no “threat” to the Rabbi. The source only cites to an op-ed he wrote, where he describes a Brandeis SJP post that called on the University to take necessary actions against the Rabbi because he had labeled their student members	The Rabbi’s op-ed states that after SJP took to social media to denounce him as “racist,” “dehumanizing,” and “divisive,” local law enforcement assigned him personal security in fear for his safety. <i>See</i> FAC n. 90. NSJP’s added quote from the

¹ Peter Reitzes, *Students for Justice in Palestine Violates UNC Policies and Threatens Students; Why Won’t the Administration Act?*, ALGEMEINER (Jan. 17, 2024), <https://www.algemeiner.com/2024/01/17/students-for-justice-in-palestine-violates-unc-policies-and-threatens-students-why-wont-the-administration-act/>; Peter Reitzes, *SJP Violated UNC’s Policies; Why Isn’t the Group Suspended?*, JEWISH NEWS & POST (last visited Nov. 12, 2024), <https://jewishpostandnews.ca/rss/sjp-violated-uncs-policies-why-isnt-the-group-suspended/>.

	as Hamas supporters, directly endangering them. (“Lastly, we firmly believe that it is essential for our university to condemn such a hateful email against one of Brandeis’s smallest minorities, and take all necessary action against Rabbi Seth Winberg, who should be held responsible for any attack or racist incident against any Palestinian, Arab or Muslim student on campus.” FAC nn.90-91.)	SJP social media post is not quoted in the cited sources or the Complaint and is therefore outside the scope of the pleadings.
Plaintiffs claim “[o]n November 17, 2023, SJP members at the University of Michigan broke into an administrative building and injured two police officers.” FAC ¶ 97(h).	Scandalous: The source cited does not even mention SJP. FAC n.101.	The cited source states that the University of Michigan Students Allied for Freedom and Equality (SAFE) organized the protest. According to its official student organization webpage, SAFE “is a Palestinian solidarity organization and the Students for Justice in Palestine (SJP) chapter at the University of Michigan.” ²
Plaintiffs claim, “In March 2024, the IRGC internally disseminated a secret memorandum titled ‘Supporting and Encouraging Palestinian Movements towards the Political Isolation of Zionism’ that called for ‘an economic blockade across four continents in solidarity with Palestinians’ to take place on April 15, 2024.” FAC ¶ 103. Plaintiffs use this allegation to then claim that the April 15 protests were planned by the IRGC, and that Defendants participated	Scandalous: As support for this claim, Plaintiffs have attached the purportedly leaked memo as Exhibit E, and cite to an article that claims to translate part of the letter. The article claims the letter says, “Given the recent developments in the issue of Palestine and the psychological impact of the Al-Aqsa Storm operation on Palestinian communities in European and American countries, it was determined to implement significant support measures for April 15	In their basis for striking, NSJP admits the IRGC memo, <i>at least</i> , demonstrates that the IRGC openly supported NSJP’s “Strike4Gaza” protests. As for NSJP’s other bases for striking, Plaintiffs are not required to authenticate exhibits or provide full translations of documents at this stage.

² *Students Allied for Freedom and Equality – MAIZE PAGES*, UMICH.EDU (last visited November 12, 2024), <https://maizepages.umich.edu/organization/safeumich>.

<p>in the April 15 protests “at the behest of Hamas and the IRGC.” FAC ¶ 108.</p>	<p>and other rallies with the aim to achieve political isolation [of Israel].” FAC n.146. The letter itself is not fully translated anywhere in either the sources cited in the Complaint, nor the exhibits submitted by Plaintiffs. Even if the document is an authentic IRGC document, it is only a letter from Majid Kazemi, head of the IRGC’s Intelligence Security Organization, to Mohammad Sajedifar, the Deputy of Cultural and Psychological Operations of the IRGC Ground Force. There is no support for Plaintiffs’ claims that the letter was “secret” or a “memo,” nor that the IRGC “called for” the April 15 protests; it merely declares the importance of providing “support measures” for the rallies already called for on April 15.</p>	
<p>“In the NSJP Toolkit, AMP and NSJP identify themselves as “PART of” a “Unity Intifada” governed by Hamas’s “unified command” of terrorist operations in Gaza.” FAC ¶ 2.</p>	<p>Scandalous: The cited document says nothing of the sort. It states that “All Palestinian factions in Gaza appear to be participating under unified command.” It does not say that NSJP or AMP claim to be part of that command.</p>	<p>The Toolkit describes a revolutionary movement that it calls a “Unity Intifada” in which “[a]ll Palestinian factions in Gaza appear to be participating under unified command.” While not explicitly stated, that “unified command” is universally known to be Hamas. The Toolkit then declares that “We as Palestinian students in exile,” meaning NSJP, “are PART of this movement, not in solidarity with this movement.” Thus, it is entirely reasonable to conclude that NSJP’s Toolkit declares it is “PART of” a</p>

		“Unity Intifada” governed by Hamas’s “unified command.”
“Indeed, one of Hamas’ fiscal sponsors, the Islamic Republic of Iran, has declared NSJP a “branch of” the terrorist network.” FAC ¶ 2.	Scandalous: The opinion of the Iranian government regarding NSJP’s activity or character is irrelevant to this case and prejudicial to NSJP.	The Iranian government’s admission that NSJP is a “branch of” Hamas is directly relevant to this case. Plaintiffs allege that NSJP is a continuation of organizations found to provide support Hamas in the United States. The statement of one of Hamas’s primary fiscal sponsors that this allegation is indeed true is certainly relevant and outweighs any potential prejudice that may result from the statement.
“AMP and NSJP have instigated a mass culture of fear, threats, violence, and overt hatred to intimidate politicians and institutions to ‘force’ American institutions to bend to Hamas’s will.” FAC at 3-4.	Scandalous: The claim is irrelevant to the pled causes of action and has no support in the brief, and is prejudicial to NSJP because it suggests NSJP has the goal of using force to carry out ‘Hamas’s will.’	The allegation is amply supported in the Complaint, most notably by NSJP’s own Toolkit, in which NSJP describes in detail its plans to carry out Hamas’s will. NSJP cannot be prejudiced by its own statements.
“... and to Jews as a people” FAC ¶ 63.	Scandalous: The allegation is irrelevant to the pled causes of action, unsupported by any fact in the FAC, and prejudicial to NSJP insofar as it asserts that NSJP members—most of whom are Semites—condone violence toward Jewish people on account of their religion or ethnicity.	The Complaint alleges in detail how NSJP and its members have committed acts of violence against Jewish students, repeatedly espoused vitriolic, antisemitic rhetoric, and called for the total annihilation of the world’s only Jewish state. NSJP’s conduct speaks for itself.
“... and to establish an environment on American college campuses where Jews are persona non grata and violence against them.” FAC ¶ 63.	Scandalous: The allegation is irrelevant to the pled causes of action, unsupported by any fact in the FAC, and prejudicial to NSJP insofar as it asserts that NSJP members condone violence toward Jewish people on account of their religion or ethnicity.	The Complaint alleges in detail how NSJP and its members have committed acts of violence against Jewish students, repeatedly espoused vitriolic, antisemitic rhetoric, and called for the total annihilation of the world’s only Jewish state.

		NSJP’s conduct speaks for itself.
“ Hamas’s PR foot soldiers in the West.” FAC ¶ 75.	Scandalous: There is no allegation that NSJP members are members of Hamas or are integrated in Hamas’ military wing. The use of the phrase ‘foot soldiers’ without such an allegation is wholly baseless, irrelevant, and intended to prejudice and harm NSJP by suggesting that they are members of Hamas.	Plaintiffs have not accused NSJP members of being “integrated in Hamas’ military wing.” The phrase “PR foot soldiers” refers to those that carry out PR services in support of the principal—here, Hamas. This allegation cannot significantly prejudice NSJP, which has self-identified as being “part of” Hamas’s “resistance.”
“NSJP acted as Hamas’ loyal foot soldiers.” FAC ¶ 78.	Scandalous: There is no allegation that NSJP members are members of Hamas or are integrated in Hamas’ military wing. The use of the phrase ‘foot soldiers’ without such an allegation is wholly baseless, irrelevant, and intended to prejudice and harm NSJP by suggesting that they are members of Hamas.	NSJP quotes the allegation out of context. The full allegation reads, “loyal foot soldiers for Hamas’s propaganda battle on university campuses across the United States.” FAC ¶ 75. Again, Plaintiffs have not accused NSJP members of being “integrated in Hamas’ military wing.” Rather, Plaintiffs allege NSJP members provide support to Hamas in the form of public relations services. This allegation cannot significantly prejudice NSJP, which has self-identified as being “part of” Hamas’s “resistance.”
“... and to incite and engage in violence directed at creating chaos and fear across the United States, intimidating American citizens and policymakers, and forcing . . .” FAC ¶ 93.	Scandalous: The unsupported and baseless allegation that NSJP attempted to create chaos and fear is irrelevant to the pled causes of action, and only intended to cast NSJP and SJP members in a false light as domestic terrorists.	The allegations are well-supported in the Complaint. The encampments, which sprung up on over 100 university campuses across the United States, included violent, genocidal chants in support of Hamas; stoking fear in fellow community members, especially those of Jewish and Israeli descent;

		and the destruction of numerous buildings. <i>See, e.g.</i> , FAC ¶¶ 109–33, 97. NSJP-promoted speakers celebrated the political pressure resulting from the riots. <i>See</i> FAC ¶ 142. Social media posts from Columbia SJP, one of NSJP’s most prominent chapters, reveal the degree to which the organization views itself as a force of revolt and revolution. <i>See, e.g.</i> , FAC ¶ 131.
“... illegal acts of domestic terrorism.” FAC ¶ 95.	Scandalous and Irrelevant: The Plaintiffs do not allege that domestic SJP protests were themselves a direct violation of anti-terrorism laws, and there is not a single fact alleged that would justify referring to SJP protests as acts of domestic terrorism. The assertion is scandalous, irrelevant, and clearly prejudicial because it seeks to tar NSJP and SJP members as domestic terrorists.	The Complaint alleges NSJP members engaged in trespass, assault, vandalism, robbery, destruction of property, harassment, and intimidation against U.S. citizens for the purposes of carrying out Defendants’ public relations campaign in the United States. <i>See, e.g.</i> , FAC ¶¶ 102, 111, 150.
“... including by sowing chaos, fear, and terror throughout the United States.” FAC ¶ 98.	Scandalous: Nowhere in the Toolkit do the authors encourage or call upon SJP chapters to ‘so[w] chaos, fear, and terror.’ The claim is irrelevant to the pled causes of action and prejudicial to NSJP because it falsely suggests that they are domestic terrorists or encourage domestic terrorism.	The allegation is both material and accurate. The Toolkit glorifies the mass rape, murder, and violence of October 7 as a heroic endeavor. FAC ¶ 79. It then encourages members of NSJP to “join the call for mass mobilization.” <i>Id.</i> The Toolkit calls for “confrontation by any means necessary,” including “armed struggle.” FAC ¶¶ 81–82. NSJP identified itself as “PART of this [Unity Intifada] movement, not in solidarity with this movement.” FAC ¶ 84. This “movement” is the

		“resistance” sparked by Hamas’ October 7 terrorist attack. FAC ¶ 83.
FAC ¶ 99, in its entirety.	Immaterial and Scandalous: It is irrelevant whether Hamas could pay for public relations services in America and it is prejudicial to baselessly claim that NSJP attempted to “generate support for its ongoing terrorism.”	The allegation is material for demonstrating why Hamas was forced to rely on Defendants, including NSJP, to provide public relations services.
FAC ¶ 100, in its entirety.	Immaterial and Scandalous: Any alleged ‘communication services’ provided after plaintiffs’ injuries occurred is immaterial to the pled causes of action and prejudicial to NSJP.	The communication services provided after October 7 are material to Plaintiffs’ claims, insofar as they are evidence of a systematic system of support that existed prior to, during, and after the October 7 terror attacks.
“Defendants attacked – and recruited others to attack – American citizens, institutions, and systems to foment a culture of fear to, with the aid of the IGRC, provide material support to Hamas.” FAC ¶ 107.	Scandalous and Immaterial: There is no support whatsoever for alleging that NSJP recruited anyone to attack people, institutions, or systems, nor that NSJP sought to create a culture of fear. Even if these claims were true, they are immaterial and irrelevant to the Plaintiffs’ claimed injuries or the pled cause of action, and clearly prejudicial to NSJP.	The allegation is supported by NSJP’s own statements in the Toolkit. NSJP recruited students to engage in violent acts of resistance by “any means necessary,” including “armed struggle,” FAC ¶¶ 81–82, and identified itself as “part of” Hamas’s “resistance” movement, FAC ¶¶ 83–84. Iranian Supreme Leader Ali Khamenei has recognized these NSJP-led protests and riots as “a branch of the Resistance Front.” FAC ¶ 148. The allegation is relevant to Plaintiffs’ allegations that NSJP is part of Hamas’s propaganda network, which is supported by the IRGC.
FAC ¶¶ 110–49, in their entirety.	Immaterial: The encampments and conference discussed in these paragraphs are clearly irrelevant to the Plaintiffs’ claimed injuries and	The allegations are highly material and go to the heart of the Complaint. The encampments demonstrate disruptive and violent actions taken by NSJP to provide

	immaterial to any pled causes of action.	public relations services to Hamas. Similarly, the discussion of the pro-terrorism Palestine People's Conference is critical for understanding the sentiment that animates NSJP and its followers—namely, the glorification of terrorism against Jewish people.
FAC ¶¶ 151-69, in their entirety.	<p>Immaterial: Statements by Hamas or other organizations expressing gratitude for the global antigenocide struggle are immaterial to the alleged acts of NSJP and irrelevant to any pled causes of action. The statements by US elected or appointed officials regarding investigations into Defendants are irrelevant to the Plaintiffs' injuries or pleadings and clearly prejudicial to NSJP insofar as they are included to suggest that NSJP and Defendants are criminals.</p>	<p>Statements by Hamas or other <i>terrorist</i> organizations expressing gratitude to supporters abroad, including the United States, and calling for escalation <i>in America</i>, are highly material to the substance of the Complaint. These statements, when considered in conjunction with the fact that Hamas frequently issued calls for support to its supporters abroad—and Defendants routinely answered the call within a day or two—is highly suggestive of coordination, an element that further demonstrates aiding and abetting. <i>See</i> FAC ¶ 102. Furthermore, statements by U.S. Government officials are relevant for demonstrating the alarming degree to which this aiding and abetting has captured the attention of federal officials, thereby legitimizing Plaintiffs' claims.</p>